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11  
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 WFTLV01, LLC, a Nevada limited liability  
15 company

16 Plaintiff

17 v.

18 SECURITY NATIONAL INSURANCE  
19 COMPANY, a Delaware corporation.

20 Defendant.

Case 2:20-cv-01845-JCM-BNW

21  
22 **STIPULATION AND ORDER  
EXTENDING TIME FOR PLAINTIFF  
TO RESPOND TO DEFENDANT'S  
MOTION TO DISMISS (ECF No. 21)**

23 [First Request]

24 IT IS STIPULATED by and between the Plaintiff and Defendant, through their  
25 respective counsel, and pursuant to LR IA 6-1 and LR 7-1, that the time for Plaintiff to respond  
26 to Defendant' Motion To Dismiss (ECF No. 21) may be extended to December 21, 2020. This is  
the parties' first request regarding a response to said motion. The parties agree and respectfully  
submit that good cause exists for this stipulation based on the following:

1       1. Plaintiffs filed their Complaint in Clark County District Court on August 17,  
 2 2020. (ECF No. 1-2).

3       2. AmTrust North America, Inc. (“AmTrust”) was served through its registered  
 4 agent on September 2, 2020. (ECF No. 1-3).

5       3. Defendants removed the action to the above-titled court on October 2, 2020 (ECF  
 6 No. 1).

7       4. On September 30, 2020, defendant Security National Insurance Company  
 8 (“Security National”) was served through the Nevada Division of Insurance.

9       5. Thereafter, the parties engaged in several good faith conferences to discuss the  
 10 issues, parties and posture of the action. To facilitate these discussions and preserve judicial  
 11 resources, the parties agreed to several extensions for Defendants to respond to the Complaint.  
 12 The parties’ discussions were productive and, as result, the parties were able to narrow and  
 13 resolve some issues and procedural matters. These accomplishments were reflected in several  
 14 subsequent stipulations, including stipulations ECF No. 11 on October 16, 2020, dismissing  
 15 defendant AmTrust without prejudice, and ECF No. 19 on November 4, 2020, dismissing  
 16 plaintiffs WFTLV02, LLC; WFTLV03, LLC; WFTLV04, LLC; and WFTLV05, LLC after the  
 17 parties agreed such plaintiffs were not necessary parties.

18       6. On November 4, 2020, defendant Security National filed a motion to exceed page  
 19 limits (ECF No. 18) relative to its anticipated motion to dismiss.

20       7. On November 6, 2020, defendant Security National filed its Motion to Dismiss  
 21 (ECF No. 21).

22       8. Plaintiff requires additional time to response to Security National’s Motion to  
 23 Dismiss (ECF No. 21) because such motion and the matters implicated in this case are  
 24 considerable, novel issues of law arising from the COVID-19 pandemic and related civil orders  
 25 that are implicated by this matter. Many of the issues raised in Security National’s Motion to  
 26 Dismiss have not been addressed by either the Ninth Circuit or the Nevada appellate courts.

27       //

1       9. Plaintiff also requires additional time to respond due to its counsel's family  
2 medical issues, which recently developed.

3       10. Therefore, the parties stipulate and agree that Plaintiff may have until December  
4 21, 2020 to respond to Defendant's Motion to Dismiss (ECF No. 21).

5       11. This is the parties' first request for extension relative to responding to  
6 Defendant's Motion to Dismiss (ECF No. 21).

7       12. This stipulation is made on good faith and for good cause, and not for any purpose  
8 to delay.

9       13. The parties further agree that this stipulated extension of time does not operate as  
10 any admission or waiver of any claim or defense by Plaintiffs or Defendants.

11       Dated: November 19, 2020

12       KENNEDY & COUVILLIER, PLLC

13       LEWIS BRISBOIS BISGAARD & SMITH  
14       LLP

15       /s/Maximiliano D. Couvillier III, Esq.

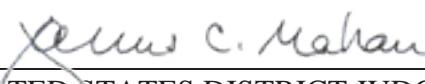
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21       **ORDER**

22       IT IS SO ORDERED.

23         
24       \_\_\_\_\_  
25       UNITED STATES DISTRICT JUDGE

26       Dated: November 30, 2020